

SM Exhibit CO

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1 RASHEENA HUFFMAN

2 MR. SMITH: No, please don't
3 provide her with her answers --

4 MS. PUBLICKER METTHAM: This is
5 what she testified to three times.

6 MR. SMITH: Please, it's not.

7 Q. What supervisor were you
8 referring to when you made this entry?

9 A. When I made this statement, like
10 I said, I said in quotes, he comes to the
11 desk and I explained if he's sick a
12 supervisor has to approve. A supervisor
13 could be me, it could be a lieutenant, it
14 could be the sick desk supervisor, it could
15 be district surgeon. It's a supervisor.

16 Q. Okay. Did you give him
17 approval?

18 A. No, I did not.

19 Q. Why not?

20 A. Because he did not request sick
21 from me.

22 Q. I thought you said he put a slip
23 on your desk --

24 A. You can't do it that way. You
25 can't just fill out a sick report on your

1 RASHEENA HUFFMAN

2 own. The proper way --

3 Q. Didn't he walk up to you say he
4 don't feel well, I need to go home?

5 A. That's not the way you do it,
6 though.

7 Q. But I'm saying he did that
8 though, he said to you I don't feel well, I
9 need --

10 A. He --

11 Q. -- to go home; is that right?
12 It's a yes or no.

13 A. He didn't -- he did it walking
14 away. He did not stand there and have a
15 conversation civilly with me and let me know
16 that he was sick. He did it and walked
17 away. He gave me a sick report and walked
18 away.

19 Q. Okay. So you don't think he was
20 asking you for permission to go sick?

21 A. No. He just said -- he stated
22 I'm sick.

23 Q. And so you didn't approve his
24 request to go sick; is that right?

25 MS. PUBLICKER METTHAM:

1 RASHEENA HUFFMAN

2 Objection. You could answer.

3 A. He didn't request to go sick.

4 Q. He didn't request to go sick --

5 A. He stated he was sick.

6 MR. SMITH: So maybe we should
7 play this recording. This is DS 50
8 October 31, 2009 day tour Lieutenant
9 Caughey menacing went sick. It starts
10 at 7:1946.

11 (Whereupon, a tape recording was
12 played.)

13 MS. PUBLICKER METTHAM: What
14 time did it stop?

15 MR. SMITH: It stopped at
16 720.28.

17 Q. Did you hear Officer Schoolcraft
18 say to you I don't feel well, I need to go
19 home?

20 A. I heard him say that there.

21 Q. Did you hear yourself responding
22 oh, okay?

23 A. When I -- if I said oh, okay, I
24 did not --

25 Q. My question is did you hear you

1 RASHEENA HUFFMAN

2 say --

3 A. He dropped it on my lap and kept
4 walking.

5 Q. Ma'am, we are going to be here
6 until next week if you don't answer my
7 questions. Okay. So my question to you is
8 I just played a recording --

9 A. And I --

10 Q. And my question to you is did
11 you hear you saying oh, okay?

12 A. Okay. If I said oh, okay, he's
13 dropping the slip report on my lap and
14 keeping walking away. If you say you wanted
15 to go sick or if you're not feeling well, if
16 you want to go home and I say oh, okay and
17 you dropped the report and keep walking,
18 that's not going sick the proper way.

19 Q. Did you say oh, okay, yes or no?

20 A. Like I said, I did not hear it
21 clearly just now.

22 Q. Would you like me to replay it
23 again for you?

24 A. -- it wasn't that I approved
25 the sick.

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2 Q. All right, well, we will play it
3 again for you so that you can hear it.

4 MR. SMITH: It starts at 720.20.

5 Q. And my question to you is
6 whether or not you can hear yourself saying
7 oh, okay, and that's the only question I'm
8 asking you.

9 (Whereupon, a tape recording was
10 played.)

11 Q. Did you hear yourself say oh,
12 okay --

13 A. Yes.

14 Q. -- in response to Officer
15 Schoolcraft --

16 A. Yes.

17 Q. -- saying I don't feel well, I
18 need to go home?

19 A. Yes.

20 Q. Thank you.

21 A. He didn't say he wants to go
22 sick. If he says he wants to go home he
23 could fill out a 28 report and go home. You
24 don't have to go sick.

25 Q. You did hear yourself saying oh,

1 RASHEENA HUFFMAN

2 okay to him in response --

3 A. Yes, and he gave me a sick
4 report, not a 28.

5 Q. You did hear yourself saying oh,
6 okay in response to him saying to you I
7 don't feel well, I need to go home; is that
8 correct?

9 A. Yes.

10 Q. Thank you. Can I show you a
11 document that was previously marked as --

12 A. And he kept walking away.

13 Q. -- Exhibit 28. I'm sorry I
14 misspoke. I'm going to show you what's been
15 previously marked as Exhibit 26. Is that
16 the sick report worksheet that Officer
17 Schoolcraft put on your lap on October 31,
18 2009?

19 A. Yeah.

20 Q. Is that your handwriting on the
21 top part of this document?

22 A. Top part, yes.

23 Q. Is that your handwriting on the
24 second page of this exhibit on the
25 right-hand column?

1 RASHEENA HUFFMAN

2 A. Yes.

3 Q. Why did you make the entry sick
4 desk Sergeant Baer, B-a-e-r?

5 A. I don't know. Maybe I spoke to
6 a supervisor there and wanted to put the
7 name of the supervisor. I don't know.

8 Q. What is the entry -- can you
9 read the entry on the first page of
10 Plaintiff's Exhibit 26, the handwritten
11 entry by you?

12 A. Sergeant Huffman called P.O.
13 Robert sick desk at 14:30 hours, states P.O.
14 Schoolcraft didn't call in sick.

15 Q. Why did you call the sick desk
16 at 14:30 hours?

17 A. Because he left the precinct
18 without going sick the proper way.

19 Q. If he had called the sick desk,
20 would that have been the proper way?

21 A. I called to see if he went sick.

22 Q. You're not answering my
23 question, ma'am. I said if he had called
24 the sick desk, would that have been the
25 proper way?

1 RASHEENA HUFFMAN

2 MS. PUBLICKER METTHAM:

3 Objection. You can answer.

4 A. If he had called the sick desk,
5 he would still have had to speak to a
6 supervisor and let them know that he was not
7 feeling well and then after that we would
8 call the sick desk and speak to the sick
9 desk and let them know that we have a MOS
10 that's, either A, being treated at the
11 precinct by EMS or going to a hospital and
12 is requesting to go sick.

13 Q. So the answer to my question is
14 no, if he had called the sick desk that
15 still would not have been the proper way to
16 go sick; is that right.

17 MS. PUBLICKER METTHAM:

18 Objection. Objection. Asked and
19 answered. You can answer again.

20 A. I still had to check to see if
21 he called the sick desk.

22 Q. What's that based on?

23 MS. PUBLICKER METTHAM:

24 Objection. You can answer.

25 A. What happened?

1 RASHEENA HUFFMAN

2 Q. Where does that come from; is
3 there a patrol guide procedure that says he
4 has to call the sick desk?

5 MS. PUBLICKER METHAM:

6 Objection. You can answer.

7 A. Then he have to call the sick
8 desk. When you're home and you're not
9 feeling well, you call the precinct and let
10 them know that you're requesting admin or
11 regular sick. The supervisor at the desk
12 will authorize the admin sick and if you're
13 not feeling well, you just let them know
14 that you're going regular sick and then you
15 go see the district surgeon the following
16 day, if you're going regular sick. The
17 district surgeon is going to determine if
18 you're going to be out sick. Admin sick you
19 don't need to go see the district surgeon.

20 Q. Is it possible for an officer
21 who is working inside the precinct to become
22 sick and go home or is there some --

23 A. Yes. It happen all the time,
24 but they usually take lost time. If he
25 don't feel well then they go sick the next

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2 tour, but if they're like having chest pains
3 or they really, really not feeling bad then
4 we call an ambulance of which is the bus to
5 the precinct and they will go to the
6 hospital and they will go sick from there.

7 Q. So one of the ways that Officer
8 Schoolcraft could have properly left the
9 precinct was to have taken lost time?

10 A. He could have took lost time.

11 Q. And that would have been a
12 proper way to leave the precinct; is that
13 correct?

14 A. If they were requesting lost
15 time --

16 MS. PUBLICKER METTHAM:

17 Objection.

18 A. -- from me and I could authorize
19 some lost time because he wasn't feeling
20 well. Which I would have been more than
21 likely have done or if he wanted to go sick
22 then I would have called the bus to the
23 precinct and then contact the sick desk and
24 he would have went sick and he would have
25 got a sick report number, SR number, to put

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into the log and let the department know
that he's out sick.

Q. Didn't you offer him lost time?

A. I don't know. He didn't request
lost time.

Q. I didn't ask you about what he
requested --

A. -- I do recall --

Q. -- I asked you whether or not
you offered him lost time?

A. I do recall -- I believe I
recall offering him lost time when he came
back upstairs when P.O. Rudi went to get him
and bring him back to the desk --

Q. So you did offer him lost time,
right?

A. I recall that.

Q. If he had said yes, I'll take
lost time that would have been an
appropriate way for him to leave the
precinct; is that correct?

A. Yeah, he fill out a 28 slip, I
sign it and then --

Q. So the answer to my question is

1 RASHEENA HUFFMAN

2 yes, that would have been a proper way for
3 him to leave the precinct?

4 MR. KRETZ: Objection.

5 MS. PUBLICKER METTHAM:

6 Objection. Misstates prior testimony.

7 Q. Is that correct?

8 A. Yes.

9 Q. In your entry in the command log
10 in the next line of the entry that we're
11 referring to, am I correct that you say if
12 he don't feel well do he need a bus or lost
13 time; is that what that entry says?

14 A. Yes.

15 Q. Okay, so did you tell
16 Schoolcraft that he, either should get a bus
17 or take lost time?

18 A. Yes.

19 Q. And a bus refers to an ambulance
20 coming, correct?

21 A. That's the same thing. Do you
22 need a bus.

23 Q. And lost time refers to him
24 filling out a 28; is that correct?

25 A. Yes.

1 RASHEENA HUFFMAN

2 Q. And the effect on the officer
3 taking lost time, do they just get less
4 hours pay for that week?

5 MS. PUBLICKER METTHAM:

6 Objection.

7 A. No. If you have time on the
8 books, then it won't affect your pay at all.

9 Q. It will offset if you have time
10 on the books then you use up that time; is
11 that right?

12 A. Yeah. Depends on if he was
13 leaving 14:00, then he would be taking an
14 hour and a half lost time.

15 Q. Further on the entry, am I
16 reading it correctly where it says I,
17 referring to you, say Schoolcraft, you can't
18 just leave like that. And Schoolcraft, you
19 can't just leave like that is in quotes?

20 A. Yes.

21 Q. So those were words that you
22 spoke to Officer Schoolcraft; is that
23 correct?

24 A. Yes.

25 Q. And you made these entries based